

**In the United States District Court  
Western District of Missouri**

RURAL COMMUNITY WORKERS ALLIANCE  
and JANE DOE

*Plaintiffs,*

v.

SMITHFIELD FOODS, INC. and SMITHFIELD  
FRESH MEATS CORP.,

*Defendants.*

**Declaration of Jane Doe**

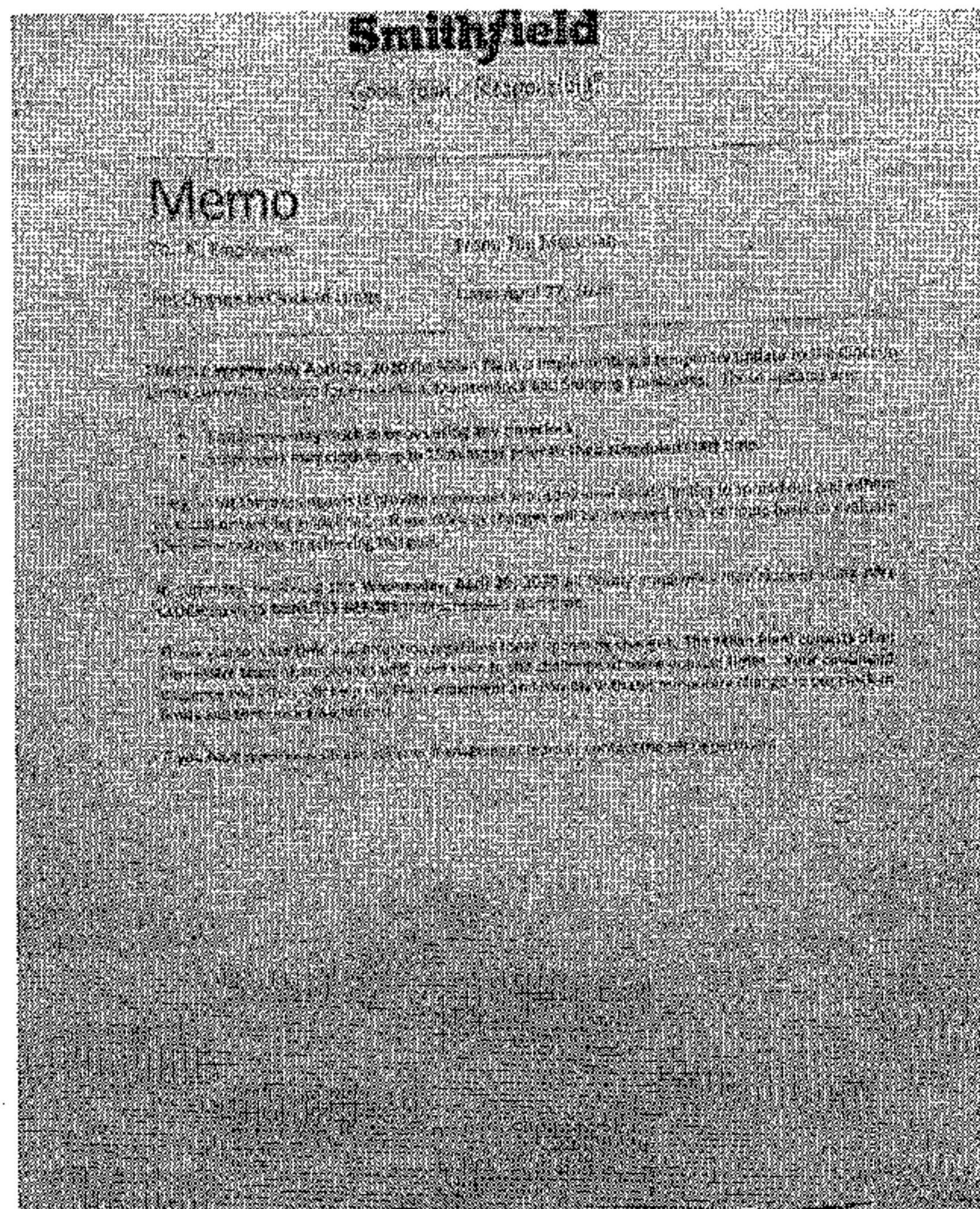
I, Jane Doe, hereby declare as follows:

1. I previously submitted a declaration in support of this case.
2. I submit this declaration to describe additional things I have witnessed since I submitted my first declaration.
3. In the afternoon following me filing this suit, a new supervisor appeared at the Milan plant (the "Plant") to check if employees were wearing masks. That new supervisor or another new supervisor has been there in the mornings and afternoons since last Thursday to see if employees are wearing masks.
4. However, I have witnessed employees without masks on in front of these supervisors and those employees were not instructed to put their masks back on.
5. Workers remain as close together on the line as they were previously, still standing shoulder-to-shoulder.



6. Starting Monday (April 27, 2020), I noticed Smithfield had changed some of the dividers between workers to make them sturdier, but it has not yet done so for all of the dividers.

7. I took the photo of the memo shown below. The memo is dated April 27, 2020. It appeared for the first time this week, and states that we will have a grace period to clock in, and can use any clock to clock in or out, to reduce crowding.



8. On Monday (April 27, 2020), I also noticed that Smithfield had added an additional tent outside the cafeteria to allow workers to sit during their lunch break.

9. However, the hallways, restrooms, and break areas remain crowded. We are regularly closer than 6-feet apart.

10. We have not been provided any additional breaks to wash our hands, or tissues to blow our noses.



11. Smithfield continues to send a worker to the line to spray our gloves with sanitizer as we work, but that worker will not spray our hands.

12. There have been no new announcements about paid sick leave.

13. No worker that I know of has been offered a test for COVID-19 and, although I know workers who have had symptoms, no worker I know of has been told by Smithfield they have been in contact with another worker who has had symptoms.

14. Starting today, Tuesday, April 28, 2020, Smithfield has reduced the number of hogs it is slaughtering at the plant, but it has also said it will reduce our hours.

15. It has informed us that we will receive an extra \$5/hour because of the reduced hours, but has also said if we take a personal day we will be paid the standard hourly rate, not the increased rate.

16. I have been told that Smithfield said in this case that if I believe the statements I have made and that workers at the Plant are at risk for contracting COVID-19 I would put my name on this case.

17. I am aware of other workers who have sued the Plant and made their name public. Only one still works at the Plant. She is regularly tracked by supervisors looking to write-up her conduct.

18. I myself have been harassed by my supervisor when I have raised much more minor concerns than those I raise here.

19. I greatly fear for the health and safety of me and my family, but I also fear what Smithfield will do to me for making these facts public.

I declare under penalty of perjury the foregoing is true and correct.

Executed in Milan, MO

DocuSigned by:

[Redacted Signature]

Jane Doe 008A1413...

4/28/2020

Dated